

FILED

JUL 02 2008

RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER REYNOLDS,

Defendant.

No. CR 07-0747 SI

[PROPOSED] STIPULATED
ORDER CONTINUING
ARRAIGNMENT

The defendant Christopher Reynolds is charged in two federal districts with bank robbery. Since Mr. Reynolds' initial appearance his counsel, AFPD Steven Kalar, has been working to resolve these two prosecutions matters in a global disposition. In this proposed stipulated order, the parties represent that they are continuing to work on a global resolution and hope to be entering a plea to charging documents for both cases at the next appearance before the magistrate.

Mr. Reynolds is currently scheduled to appear before the Court on Tuesday, July 8, 2008 for arraignment. In this stipulated order, Mr. Kalar represents that he is unavailable on that date due to a full-day evidentiary hearing scheduled before the Honorable Charles R. Breyer. The defense accordingly requests that the arraignment be continued to July 31, 2008. The parties will continue discussions with government counsel and appointed defense counsel in the Western District of New York regarding a global disposition and hope to have

1 a disposition for both matters by July 31st.

2 The government has no objection to this request.

3 Therefore, for good cause shown the arraignment now scheduled for Mr. Reynolds on
4 July 8th shall be vacated. The matter shall be added to the Court's calendar on Thursday, July
5 31, 2008 at 9:30 for arraignment. Time for arraignment and under the Speedy Trial Act shall
6 be excluded under Federal Rule of Criminal Procedure 5.1 for good cause and to permit for
7 the continuity of counsel. Fed. R. Crim. Proc. 5.1; 18 U.S.C. Section 3161(h)(8)(A) &
8 (B)(iv).

9 IT IS SO ORDERED.

10 7-2-08
11 DATED



MARIA ELENA-JAMES
United States Magistrate Judge

14 IT IS SO STIPULATED.

16 7/1/2008
17 DATED

/s
JOSEPH P. RUSSONIELLO
United States Attorney
Northern District of California
AL SAMBAT
Assistant United States Attorney

22 7/1/2008
23 DATED

/s
BARRY J. PORTMAN
Federal Public Defender
Northern District of California
STEVEN G. KALAR
Assistant Federal Public Defender